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Attorneys for Defendant
CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING CO., INC.
26 Broadway - 28th Floor
New York, New York 10004
(212) 482-0001

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
**IN RE COMBINED WORLD TRADE CENTER
AND LOWER MANHATTAN DISASTER SITE
LITIGATION**

21 MC 103 (AKH)

-----X
JAMIE ROJAS (and wife, JOHANNA HERNANDEZ)

**DOCKET NO:
07 CV 04511**

Plaintiffs,

-against-

**7 WORLD TRADE COMPANY, L.P., A RUSSO
WRECKING, INC., ABM INDUSTRIES INC.,
ABM JANITORIAL NORTHEAST, INC., AMEC
MANAGEMENT, INC., AMEC EARTH
ENVIRONMENTAL, INC., ANTHONY CORTESE
SPECIALIZED HAULING LLC., ATLANTIC
HEYDT CORP., BECHTEL ASSOCIATES PROFESSIONAL
CORPORATION; BECHTEL CONSTRUCTION, INC.,
BECHTEL CORPORATION; BECHTEL ENVIRONMENTAL
INC., BERKEL & COMPANY, CONTRACTORS,
INC., BIG APPLE WRECKING & CONSTRUCTION CORP.,
BOVIS LEND LEASE LMB, INC., BREEZE CARTING
CORP., BREEZE NATIONAL INC., BRER-FOUR
TRANSPORTATION CORP., BURO HAPPOLD
CONSULTING ENGINEERS, P.C., C.B. CONTRACTING
CORP., CANRON CONSTRUCTION COP., CORD
CONTRACTING CO., INC., DAKOTA DEMO-TECH;
DIAMOND POINT EXCAVATING CORP., DIEGO
CONSTRUCTION, INC., DIVERSIFIED CARTING, INC.,
DMT ENTERPRISE, INC., D'ONOFRIO GENERAL
CONTRACTORS CORP., EAGLE LEASING &
INDUSTRIAL SUPPLY INC., EAGLE ONE ROOFING**

**NOTICE OF
ADOPTION OF
ANSWER TO
MASTER COMPLAINT**

CONTRACTORS, INC., EJ DAVIES, INC., EN-TECH CORP., EVERGREEN RECYCLING OF CORONA (EROC) EWELL W. FINLEY, P.C., EXECUTIVE MEDICAL SERVICES, P.C, FLEET TRUCKING, INC., FRANCIS A. LEE EXTERIOR RESTORATION; INC., FTI TRUCKING, INC., GILSANZ, MURRAY & STEFICEK LLP., GOLDSTEIN ASSOCIATES CONSULTING ENGINEERS, PLLC., HALLEN WELDING SERVICE, INC.; H.P. ENVIRONMENTAL; KOCH SKANSKA INC., LAQUILA CONSTRUCTION, INC., LASTRADA GENERAL CONTRACTING CORP. LESLIE E. ROBERTSON ASSOCIATES CONSULTING ENGINEERS, P.C., LIBERTY MUTUAL GROUP; LOCKWOOD, KESSLER & BARLETT, INC., LUCIUS PITKIN, INC., LZA TECH-DIV OF THORTON TOMASETTI;; MANAFORT BROTHERS INCORPORATED; MAZZOCCHI WRECKING INC., HUDSON MERIDIAN CONSTRUCTION GROUP; LLC F/K/A MERIDIAN CONSTRUCTION CORP., MORETRENCH AMERICAN CORP., MRA ENGINEERING, P.C., MUESER RUTLEDGE CONSULTING ENGINEERS, INC., NACIREMA INDUSTRIES INCORPORATED; NEW YORK CRANE & EQUIPMENT CORP., NICHOLSON CONSTRUCTION COMPANY; PETER SCALAMANDRE & SONS, INC., PINNACLE ENVIRONMENTAL CORP., PLAZA CONSTRUCTION CORP., PLAZA CONSTRUCTION CORP., PRO SAFETY SERVICES, LLC.; PT & L CONTRACTING CORP., ROBERT SILMAN ASSOCIATES, ROBERT L. GEROSA, INC., RODAR ENTERPRISES, INC., ROYAL GM, INC., SAB TRUCKING INC., SAFEWAY ENVIRONMENTAL CORP., SEASONS INDUSTRIAL CONTRACTING; SEMCOR EQUIPMENT & MANUFACTURING CORP., SILVERITE CONTRACTING CORPORATION; SIMPSON GUMPERTZ & HEDGER, INC., SKIDMORE, OWING & MERRILL LLP; SURVIVAIR, TISHMAN CONSTRUCTION CORPORATION OF MANHATTAN; TISHMAN CONSTRUCTION CORPORATION OF NEW YORK; TISHMAN INTERIORS CORPORATION; TISHMAN SPEYER PROPERTIES; THORTON-TOMASETTI GROUP, INC., TORRETTA TRUCKING, INC., TOTAL SAFETY CONSULTING, LLC., TUCCI EQUIPMENT RENTAL CORP., TULLY CONSTRUCTION CO., INC.,

**TURNER CONSTRUCTION COMPANY; ULTIMATE
DEMOLITION/CS HAULING (JOINT VENTURE);
VOLLMER ASSOCIATES LLP., WEEKS MARINE INC.,
WEIDLINGER ASSOCIATES, CONSULTING ENGINEERS,
P.C., WHITNEY CONTRACTING INC., WOLKOW-BRAKER
ROOKING CORP., WORLD TRADE CENTER PROPERTIES, LLC.,
WSP CANTOR SEINUK, YANUZZI & SONS, INC., YONKERS
CONTRACTING COMPANY, INC., YORK HUNTER
CONSTRUCTION, LLC, ZIEGENFUSS DRILLING, INC.,**

OFF SITE:

**100 CHURCH, LLC, ALAN KASMAN DBA KASCO,
AMBIENT GROUP, INC., AMERICAN EXPRESS BANK, LTD.,
AMERICAN EXPRESS COMPANY, AMERICAN
EXPRESS TRAVEL RELATED SERVICES COMPANY, INC.,
ANN TAYLOR STORES CORPORATION, BATTERY PARK
CITY AUTHORITY, BFP TOWE C CO. LLC BFP TOWER
C MM LLC., BLACKMON-MOORING-STEAMATIC
CATOSTOPHE, D/B/A/ BMS CAT, BROOKFIELD
FINANCIAL PROPERTIES, INC.,
BROOKFIELD FINANCIAL PARTNERS, L.P.,
BROOKFIELD PARTNERS, LP., BROOKFIELD
PROPERTIES, CORPORATION, BROOKFIELD
PROPERTIES HOLDING INC., CUNNINGHAM DUCT
CLEANING CO., INC., ENVIROTECH CLEAN AIR, INC.,
GPS ENVIRONMENTAL CONSULTANTS, INC.,
HILLMAN ENVIRONMENTAL GROUP, LLC.,
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,
KASCO RESTORATION SERVICES CO.,
LAW ENGINEERING, P.C., LEHMAN BROTHERS
HOLDING, INC., LEHMAN BROTHERS INC., LEHMAN
COMMERCIAL PAPER, INC., MERRILL LYNCH
& CO., INC., NOMURA HOLDING AMERICA, INC.,
NOMURA SECURITIES INTERNATIONAL, INC.,
STRUCTURE TONE (UK), INC., STRUCTURE TONE
GLOBAL SERVICES, INC., TOSCORP INC.,
TRAMMELL CROW COMPANY, TRAMMELL
CROW CORPORATE SERVICES, INC., TRC
ENGINEERS, INC., TUCKER ANTHONY, INC.,
WESTON SOLUTIONS, INC., WFP RETAIL
CO., G.P., CORP., WFP RETAIL CO. L.P.,
WFP TOWER A CO., WFP TOWER A CO., G..P.
CORP., WFP TOWER A CO., L.P., WFP TOWER B**

**CO. G.P., CORP., WFP TOWER B HOLDING
CO., LP., WFP TOWER B. CO., L.P., and ZAR
REALTY MANAGEMENT**

Defendants.

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PLEASE TAKE NOTICE, that defendant **CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO., INC.** ("CUNNINGHAM"), by its attorneys, **RUSSO, KEANE & TONER, LLP**, as and for its Response to the allegations set forth in the Complaint by Adoption (Check-Off-Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopt their Answer to Master Complaint dated, August 1, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant, **CUNNINGHAM** demands judgment dismissing the above captioned caption action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
August 25, 2008

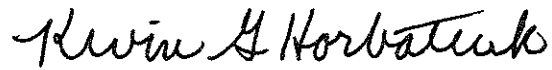
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RK&T File No. 824.078**

TO: **CHRISTOPHER R. LaPOLA, ESQ.,
WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Attorney for Plaintiffs
JAMIE ROJAS (and wife, JOHANNA HERNANDEZ)
115 Broadway 12th Floor
New York, New York 10006**

CERTIFICATION OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by placing a copy of the same in the United States mail, postage prepared and properly addressed, this the 25TH day of August, 2008.

CHRISTOPHER R. LaPOLA, ESQ.,
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Attorney for Plaintiffs
JAMIE ROJAS (and wife, JOHANNA HERNANDEZ)
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